

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (SN)

This document relates to:

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-cv-06978

Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03-cv-09849

Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al., Case No. 04-cv-01923

Continental Casualty Co., et al. v. Al Qaeda, et al., Case No. 04-cv-05970

Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al., Case No. 04-cv-07065

Euro Brokers, Inc., et al. v. Al Baraka, et al., Case No. 04-cv-07279

**Declaration of Steven T. Cottreau in Support of
Defendant Dubai Islamic Bank's Memorandum of Law
in Opposition to Plaintiffs' Motion to Compel**

I am an attorney licensed to practice in New York. I am with the law firm of Jones Day, counsel to Defendant Dubai Islamic Bank. I submit this declaration to transmit to the Court the following documents submitted in support of Dubai Islamic Bank's Memorandum of Law in Opposition to Plaintiffs' Motion to Compel (Nov. 13, 2017):

1. Exhibit 1 is a copy of Magistrate Judge Maas' Discovery Order (Dkt. 2381) (Oct. 28, 2010).
2. Exhibit 2 is a copy of Dubai Islamic Bank's Responses and Objections to Plaintiffs' Requests for Production (Jan. 21, 2011).
3. Exhibit 3 is a copy of the letter from Steven T. Cottreau to Sean Carter (July 7, 2011).
4. Exhibit 4 is a copy of the email from J. Scott Tarbutton to Steven T. Cottreau (July 15, 2011).
5. Exhibit 5 is a copy of the letter from Steven T. Cottreau to Sean Carter (Sept. 8, 2011).
6. Exhibit 6 is a copy of the letter from Steven T. Cottreau to Sean Carter (Sept. 22, 2011).

7. Exhibit 7 is a copy of the letter from Steven T. Cottreau to Sean Carter (Aug. 30, 2012).
8. Exhibit 8 is a copy of Dubai Islamic Bank's Responses and Objections to Plaintiffs' Supplemental Requests for Production (Sept. 4, 2012).
9. Exhibit 9 is a copy of the letter from Steven T. Cottreau to Sean Carter (Aug. 22, 2012).
10. Exhibit 10 is a copy of Dubai Islamic Bank's Opposition to Plaintiffs' Motion to Compel (Dkt. 3057) (Sept. 30, 2015).
11. Exhibit 11 is a copy of the letter from Steven T. Cottreau to Sean Carter (Apr. 13, 2016).
12. Exhibit 12 is a copy of the letter from Katie Barlow to Sean Carter (Mar. 22, 2017).
13. Exhibit 13 is a copy of excerpts from the hearing transcript before Magistrate Judge Maas (June 28, 2013).
14. Exhibit 14 is a copy of the Memorandum Decision and Order of Judge Daniels (Dkt. 2252) (June 17, 2010).
15. Exhibit 15 is a copy of excerpts of the trial transcript in *United States vs. Usama bin Laden et al.*, S(7) 98 Cr. 1023 (Feb. 6, 2001).
16. Exhibit 16 is a copy of the Memorandum in Support of Defendant Saudi Binladin Group's Motion to Dismiss (Dkt. 3701) (Aug. 21, 2017).

I declare under the penalties of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on November 17, 2017.

/s/ Steven T. Cottreau
Steven T. Cottreau